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Attorneys for
Robert Membeno, Trustee for SAI Trust
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NH&S File No.:   00000840LCG

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	) CHAPTER 11
	)
CALPINE CORPORATION, et al,	) Case No. 05-60200 (BRL)
	) Jointly Administered
	)
Debtor.	)
	)

DECLARATION OF LAWRENCE C. GLYNN IN FURTHER SUPPORT
OF SAI TRUST'S MOTION FOR SUMMARY JUDGMENT

Lawrence C. Glynn declares under penalty of perjury as follows:

1.   I am an associate with the law firm of Nicoletti Hornig & Sweeney and am fully familiar with the facts of this matter through my review of the file maintained by this office in this regard.

2.   I submit this declaration in further support of SAI Trust's ("SAI") Motion for Summary Judgment.

3.   Calpine has failed to submit any of its "financial reports" (See Debtors' Brief in Support of its Motion for Summary Judgment , hereinafter "Debtors' Br." at ¶20) or "detailed

financial information" or "journal specific entries" (See Debtors' Resp. at p 11) in response to SAI

Trust's discovery demands. Annexed hereto as Exhibit "A" is a true and accurate copy of Debtors'

discovery responses.

4.   In fact, Debtors' response to SAI's properly served Request for Production of

Documents, Interrogatories and Requests for Admission are wholly deficient.

5.   Calpine has not submitted any of its "financial reports," "detailed financial

information" or "journal-specific entries" in any of its previous submissions to this Court.

6.   Calpine has not submitted any of its "financial reports," "detailed financial

information" or "journal-specific entries" in briefing its motion for summary judgment or in

opposition to SAI Trust's motion for summary judgment.

7.   Pursuant to Title 28 of the United States Code §1746, I declare under penalty of

perjury that the foregoing is true and correct.

Dated: New York, New York
       September 16, 2008

                                  By: /s/ *Lawrence C. Glynn*
                                       Lawrence C. Glynn